

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X
	: Civil Nos.
	: 21 MC 97 (AKH)
	: 21 MC 101 (AKH)
IN RE SEPTEMBER 11 LITIGATION	:
	: This Notice relates to:
- and -	: 03 CV 6803 (AKH)
	: DANIELLE LEMACK, et al. v.
IN RE SEPTEMBER 11 PROPERTY DAMAGE AND	: AMERICAN AIRLINES, INC.,
BUSINESS LOSS LITIGATION	: et al.
	:
	: <u>NOTICE OF MOTION</u>
	:
-----	X

PLEASE TAKE NOTICE that defendants American Airlines, Inc., AMR Corporation and Globe Aviation Services Corporation, will move this Court upon the accompanying declaration and memorandum of law, at a date and time to be set by the Court, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order: (1) approving the agreement entered into by plaintiffs Danielle Lemack and Carie Lemack and certain defendants, dated September 6, 2007, settling the claims asserted in *Lemack v. American Airlines, Inc., et al.*, 03 Civ. 6803 (AKH), (the "Settlement"); (2) entering final judgment pursuant to Rule 54(b) of the Federal Rules of Civil Procedure; (3) ruling that the liability limitation contained in section 408(a)(1) of the Air Transportation Safety and System Stabilization Act applies to the Settlement amount; and (4) dismissing the Complaint in *Lemack v. American Airlines, Inc., et al.*, 03 Civ. 6803 (AKH), with prejudice as to all defendants.

Dated: New York, New York
September 25, 2007

Respectfully submitted,

CONDON & FORSYTH LLP

By: 

Desmond T. Barry, Jr., Esq. (DB 8066)
7 Times Square
New York, New York 10036
(212) 894-6770

-and-

DEBEVOISE & PLIMPTON LLP
Roger E. Podesta, Esq. (RP 1749)
Maura K. Monaghan, Esq. (MM 7682)
919 Third Avenue
New York, New York 10022
(212) 909-6000

Attorneys for Defendants
AMERICAN AIRLINES, INC. and
AMR CORPORATION

JONES HIRSCH CONNORS & BULL, PC

By: 

James P. Connors, Esq. (JC 5421)
One Battery Park Plaza, 28th Floor
New York, New York 10004
(212) 527-1000

-and-

LORD, BISSELL & BROOK
Gary W. Westerberg, Esq.
111 South Wacker Drive
Chicago, Illinois 60606
(312) 443-0700

-and-

KELLY, LIBBY & HOOPES, P.C.
Paul V. Kelly, Esq.
175 Federal Street
Boston, Massachusetts 02110
(617) 338-9300

Attorneys for Defendant
GLOBE AVIATION SERVICES
CORPORATION